



Lieutenant Governor

## State of Utah

## DEPARTMENT OF NATURAL RESOURCES

MICHAEL R. STYLER Executive Director

Division of Oil, Gas and Mining
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Division Director

February 2, 2011

Dave Shaver, Manager West Ridge Resources, Inc. P.O. Box 910 East Carbon, Utah 84520-0910

Subject: Change in Water Monitoring, Task ID #3717, West Ridge Resources, Inc., West Ridge

Mine, C/007/0041

Dear Mr. Shaver:

The Division has reviewed your application to change your water monitoring plan at the West Ridge Mine.

The Division has determined that there are deficiencies that must be addressed before a determination can be made that the requirements of the R645 Coal Mining Rules have been met, and an approval can be granted. Those deficiencies are listed as an attachment to this letter.

Each deficiency identifies its author by that author's initials in parentheses; such that your staff can directly communicate with that individual should any questions arise relative to the preparation of West Ridge Resource's response to that particular deficiency.

The plans as submitted are denied. Please resubmit the entire application.

Sincerely,

Daron R. Haddock

Haddsek

Permit Supervisor

DRH/sqs

cc: Price Field Office

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## Deficiency List Task No. 3717 Change in Water Monitoring

The members of the review team include the following individuals:

Steve Christensen (SKC) 801-538-5350

- **R645-301-731.210:** The Permittee must revise Table 7-1, Hydrologic Monitoring Protocols and Locations to depict the termination of water monitoring activity at spring site SP-15. Table 7-1 in the application appears to depict SP-15 as being actively monitored. (SKC)
- **R645-301-731.210:** The Permittee must revise the application to reflect on-going quarterly water monitoring (field and lab) for spring monitoring sites SP-12, SP-13, SP-101, SP-102, SP-80 and SP-8. Each of these springs has recently exhibited fairly significant upward trends in TDS and its associated components. As such, annual laboratory sampling is not approved at this time. (SKC)
- **R645-301-731.210:** The Permittee must revise Table 7-1, *Hydrologic Monitoring Protocols and Locations* to list Protocol D and provide a reference to the page where the specific analytical parameters for UG-1 are listed. (SKC)
- **R645-301-731.220:** The Permittee must revise the application to reflect on-going quarterly water monitoring (both field and lab) of surface water monitoring site ST-8. Based upon projected mining activity to occur adjacent to Grassy Trail Reservoir and given that ST-8 is the only surface-water monitoring site located below the reservoir, the Division finds that quarterly monitoring (field and lab analyses) of this site should continue. However; the Division would be amenable to replacing ST-8 with a monitoring site in closer proximity to the permit area in an effort to more accurately identify impacts associated with mining activity. (SKC)
- **R645-301-731.220:** Based upon projected mining activity in the areas adjacent to stream monitoring sites ST-3 and ST-9, the Permittee must revise the application to reflect continued quarterly water monitoring (both field and lab) for stream monitoring sites ST-3 and ST-9. The reduction in laboratory analyses from quarterly to annual for stream monitoring site ST-10 is approved. (SKC)
- R645-301-731.220: Based on the historically erratic water quality trends of the minewater discharge, the Permittee must revise the application to reflect continued quarterly water monitoring (both field and lab) for stream monitoring site ST-6. (SKC)